IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: DIISOCYANATES ANTITRUST LITIGATION

This Document Relates to: All Actions

Master Docket Misc. No. 18-1001

MDL No. 2862

MOTION TO ENTER DEFENDANTS' PROPOSED ORDER REGARDING CASE SCHEDULE

As discussed during the March 2, 2022, telephonic status conference, Plaintiffs and Defendants exchanged correspondence regarding a pretrial schedule with the aim of reaching an agreement. Not having reached an agreed-upon schedule, Defendants hereby submit their proposed schedule. The Parties respectfully request that they be permitted additional time to meet and confer in an attempt to narrow the remaining differences, and to the extent such differences persist, each be allowed to submit short simultaneous briefs in support of their respective positions by April 6, 2022.

Dated: March 18, 2022

/s/ John F. Terzaken

John F. Terzaken (DC 474015)

Abram J. Ellis Avia Gridi

SIMPSON THACHER & BARTLETT LLP

900 G Street, N.W. Washington, DC 20001 Telephone: (202) 636-5500 Facsimile: (202) 636-5502 john.terzaken@stblaw.com AEllis@stblaw.com avia.gridi@stblaw.com

Counsel for Covestro LLC

Respectfully submitted,

/s/ Alden L. Atkins

Alden L. Atkins (DC 393922)

Craig P. Seebald Charles L. Wesley

VINSON & ELKINS LLP

2200 Pennsylvania Avenue, N.W.,

Suite 500 West

Washington, DC 20037

Tel.: (202) 639-6500 Fax: (202) 639-6604 aatkins@velaw.com

cseebald@velaw.com lwesley@velaw.com

Counsel for the Wanhua Chemical (America) Co., Ltd.

/s/ David M. Bernick

David M. Bernick (NY 4443396)

KIRKLAND & ELLIS LLP

1301 Pennsylvania Avenue, N.W.

Washington, DC 20004

Telephone: (202) 389-3201

Facsimile: (202) 389-5200

david.bernick@kirkland.com

Daniel E. Laytin, P.C. [IL 6257119]

Christa C. Cottrell, P.C. [IL 6284749]

Vanessa Barsanti [IL 6304193] Jonathan N. Adair [IL 6320193]

300 North LaSalle

Chicago, IL 60654

Telephone: (312) 862-2400

Facsimile: (312) 862-2200

daniel.laytin@kirkland.com

christa.cottrell@kirkland.com

vanessa.barsanti@kirkland.com

jonathan.adair@kirkland.com

Wendy West Feinstein (PA 86698)

MORGAN, LEWIS & BOCKIUS LLP

One Oxford Centre, 32nd Floor

Pittsburgh, PA 15219-6401

Tel.: (412) 560-7455

Fax: (412) 560-7001

wendy.feinstein@morganlewis.com

/s/ Benjamin R. Nagin

Benjamin R. Nagin [NY 2837078]

Martin B. Jackson [NY 4117743]

SIDLEY AUSTIN LLP

787 Seventh Avenue

New York, NY 10019

Telephone: (212) 839-5300

Facsimile: (212) 839-5599

bnagin@sidley.com

mjackson@sidley.com

Allen C. Kim (CA 155502) SIDLEY AUSTIN LLP

555 West Fifth Street, Suite 4000

Los Angeles, CA 90013

Tel.: (213) 896-6105

Fax: (213) 896-6600

akim@sidley.com

Samuel W. Braver (PA 19682)

DENTONS COHEN & GRIGSBY P.C.

625 Liberty Avenue, 5th Floor

Pittsburgh, PA 15222 Tel.: (412)

297-4602 Fax: (412) 209-0672 samuel.braver@dentons.com

Counsel for the MCNS Polyurethanes USA Inc.

Counsel for Defendant The Dow Chemical Company

/s/ Andrew S. Marovitz

Andrew S. Marovitz (IL 6201574)

Britt M. Miller

Daniel T. Fenske

MAYER BROWN LLP

71 South Wacker Drive

Chicago, IL 60606

Telephone: (312) 782-0600

amarovitz@mayerbrown.com

bmiller@mayerbrown.com

dfenske@mayerbrown.com

Ginevra Ventre (PA 316897)

REED SMITH LLP

Reed Smith Centre

225 Fifth Avenue, Suite 1200

Pittsburgh, PA 15222

Tel: (412) 288-3131

/s/ William S. Farmer

William S. Farmer (CA 46694)

David M. Goldstein

David C. Brownstein

FARMER BROWNSTEIN JAEGER &

GOLDSTEIN & KLEIN LLP

235 Montgomery Street, Suite 835

San Francisco, CA 94104

Tel.: (415) 962-2873

Fax: (415) 520-5678

wfarmer@fbj-law.com

dgoldstein@fbj-law.com

dbrownstein@fbj-law.com

James A. Backstrom (PA 24523) JAMES A. BACKSTROM.

COUNSELLOR AT LAW

1515 Market Street, Suite 1200

Fax: (412) 288-3063 gventre@reedsmith.com

Philadelphia, PA 19102

Tel.: (215) 864-7797 jabber@backstromlaw.com

Counsel for BASF Corporation

Counsel for Mitsui Chemicals America, Inc.

/s/ John E. Schmidtlein

John E. Schmidtlein [DC 441261]
Zachary K. Warren [DC 1015292]
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
jschmidtlein@wc.com

zwarren@wc.com

Michael J. Sweeney [PA 43683] DICKIE, MCCAMEY & CHILCOTE, P.C. Two PPG Place, Suite 400 Pittsburgh, PA 15222-5402 Telephone: (412) 281-7272 msweeney@dmclaw.com

Counsel for the Huntsman Defendants

CERTIFICATE OF SERVICE

I hereby certify, that on March 18, 2022, I caused a copy of the foregoing to be filed electronically. Notice of this filing will be sent by email to all parties by operation of the Court's CM/ECF system.

/s/ Jonathan N. Adair